



7 November 1983

Environmental Protection Agency  
Office of Waste Programs Enforcement  
401 M Street, SW  
Washington, DC 20460

Attention: Ms. Julie Klaas (WH 527F)

Subject: Contract No. 68-01-6769, Work Assignment No. 83-22, and  
Work Assignment Change Nos. 1 and 2  
(GCA 1-625-022)

Dear Ms. Klaas:

In accordance with Article III - Reports of Work of the subject Contract, enclosed herewith are two (2) copies of the Work Plan for the subject Work Assignment, complete with cost estimate (see Section 9.0), for your review and approval. It should be noted that GCA estimates a requirement for 392 technical labor hours for WA No. 83-22 in contrast to the Government estimate of 250 TLH.

If any questions arise in conjunction with this submission, please feel free to contact the undersigned.

Very truly yours,

*Mary L. Atkinson*

Mary L. Atkinson  
Assistant Manager  
Contract Administration

MLA/ble

Enclosures (2)

cc: Ms. Marian Bernd  
(w/copy)

12/7/83  
Copies to: Julie S;  
Chuck S;  
Mike B.

GCA CORPORATION  
Technology Division

213 Burlington Road  
Bedford, Massachusetts 01730  
Telephone: 617-275-5444  
Telex: 92-3339

**ENFORCEMENT  
SENSITIVE**

USEPA RCRA



3009259

RESPONSIBLE PARTY SEARCHES AT  
ARRCOM AND TIME OIL COMPANY SITES

PRIVILEGED WORK PRODUCT PREPARED  
IN ANTICIPATION OF LITIGATION

ENFORCEMENT  
CONFIDENTIAL

WORK PLAN

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Program Enforcement  
Washington, D.C. 20460

Date Prepared: 7 November 1983

Under Contract No.: 68-01-6769

Work Assignment No. 83-22

(GCA 1-625-022)

GCA CORPORATION  
GCA/TECHNOLOGY DIVISION  
Bedford, Massachusetts 01730

## 2.0 TABLE OF CONTENTS

|  | <u>Page</u> |
|--|-------------|
| 1.0 Title Page   | 1           |
| 2.0 Table of Contents                                    | 2           |
| 3.0 Introduction   | 3           |
| 4.0 Project Approach/Deliverables                        | 5           |
| 5.0 Program Schedule of Work                             | 11          |
| 6.0 Personnel  | 12          |
| 7.0 Anticipated Interviews, Subcontractor/Consultant Use | 13          |
| 8.0 Anticipated Problems in Completing the Assignment    | 14          |
| 9.0 Cost Estimate  | 15          |
| 10.0 Exceptions to the Work Assignment                   | 19          |

### 3.0 INTRODUCTION

#### Background

This Work Assignment, originally entitled "Responsible Party Searches at the Arrcom and Queen City Farm Sites" with an effective date of 19 July 1983, was received by GCA on 20 July 1983. Based on the type of technical effort required, it was determined that GCA's subcontractor, TechLaw, should perform the work. A copy of the Work Assignment was sent to TechLaw on 22 July 1983.

Upon receipt, TechLaw telephoned the Region X contact to obtain additional information for preparation of this Work Plan. On 11 August 1983, the Region X contact indicated that the current situation in the Queen City Farm Site litigation suggested that the search for PRP should be postponed and that the information requested on the Arrcom site was still not fully defined. As a result of the 11 August 1983 telephone conversation between TechLaw and the Region X contact, it was agreed that Work Plan development should be stopped.

On 17 August 1983, the Region X contact notified GCA that the Work Assignment would be amended by striking Queen City Farm and replacing it with Time Oil Co. An amendment to the Work Assignment, with an effective date of 26 August 1983, was received at GCA on 31 August 1983. A review of the amended assignment revealed that it was still appropriate for TechLaw to perform the work and a copy of the amended assignment was sent to TechLaw on 2 September 1983.

Upon receipt, TechLaw contacted both Region X personnel identified in the amended Work Assignment. This Work Plan reflects the needs and directions communicated to both GCA and TechLaw during telephone conversations prior and subsequent to the issuance the amended Work Assignment.



EPA Region X has requested assistance in developing a list of Potentially Responsible Parties involved in the generating, transporting or disposing of hazardous wastes at the two (2) hazardous waste sites listed below:

1. Arrcom Site - Idaho
2. Time Oil Company Site - Washington

Preliminary title information on both sites is available at the Regional office.

#### Statement of Work

TechLaw will investigate the company/corporate structure of the owners and operators of both sites. For the Time Oil Co. site, a more complete history of ownership and operators, dating from 1959, will be developed. For both sites, TechLaw will supplement the EPA case files by the addition of information and documentation currently in the possession of state and local enforcement, environmental and health officials.

For the Arrcom site, TechLaw will conduct interviews with responsible parties identified during the steps set forth above and develop a list of generators and transporters so that 104e letters can be sent by EPA.

For the Time Oil Co. site, TechLaw will conduct interviews with former employees of the identified operators to investigate the history of work practices on the site, including waste disposal practices, spills, and chemicals handled and their sources. An attempt will be made to determine from the interviews where material was deposited on the site in order to assist EPA in locating test borings.

#### 4.0 PROJECT APPROACH

##### Tasks

##### Arrcom Site

Title search results are available for this site. Information on the corporate structure of owners and operators, as well as a list of generators and transporters will be obtained.

##### Task 1 - Meetings with EPA Region X

TechLaw personnel will travel to Region X and meet with the Regional officials responsible for the site. TechLaw will determine the status of EPA investigations and review all available information and documentation. EPA staff, other than Superfund personnel who have been involved in these sites, will be interviewed as well.

TechLaw will obtain the names of state and local officials who will be contacted also.

##### Task 2 - Contact with State/Local Officials

TechLaw will contact state officials responsible for the site to obtain and develop additional case information to supplement the case file. TechLaw will obtain the names of state employees or county and city officials who may possess additional documentation or information concerning the site. Copies of relevant state case files will be requested by TechLaw.

##### Task 3 - Corporate Structure Information

For each identified owner or operator of the ARRCOM site, TechLaw will develop information on corporate structure by contact with the appropriate state agencies and reference to public documents, such as

Dunn & Bradstreet reports, SEC reports, and Moody's Industrial Manual. Articles of incorporation and company annual reports will be reviewed if available.

#### Task 4 - Review of FBI Records

If available, TechLaw will review those records now in the possession of a Grand Jury and supplement the case file with this information. If the actual records are unavailable to TechLaw but the information in these records is made available to EPA personnel, TechLaw will obtain this information from those EPA officials for inclusion in the case file.

#### Task 5 - Interviews with Generators/Transporters

With approval of EPA Regional officials, TechLaw will contact, by phone, those generators or transporters identified during steps 1 through 4 from which it is believed that further relevant information may easily be obtained.

#### Task 6 - Composite Case File Preparation and Report

TechLaw will organize all Federal, state, and other documents according to responsible parties and other categories likely to be relevant in enforcement proceedings. Final case file organization will be in accordance with instructions from EPA. A listing of documents, by individual document number, will be prepared.

TechLaw will prepare a report for the site, setting forth:

1. The corporate status and structure of each owner or operator of the site; and
2. A list of generators and transporters of waste disposal at the site as identified in the case file with reference to specific documents in the case file.



### Time Oil Company Site

Although some owner and operator information is available at the Regional Office, a title search dating back to 1959 needs to be performed. Corporate structure information on owners and operators, as well as details of waste disposal practices at the site, must be developed.

#### Task 1 - Meetings with EPA Region X

TechLaw personnel will travel to Region X and meet with the Regional officials responsible for the site. TechLaw will determine the status of EPA investigations and review all available information and documentation.

TechLaw will also obtain the names of local individuals (former employees) or corporations with knowledge of activities at the site. These persons will be contacted for additional information or documentation concerning the site (see Task B.4).

#### Task 2 - Contact with State/Local Officials

TechLaw will contact state officials responsible for the site to obtain and develop additional case information to supplement the case file. TechLaw will obtain the names of state employees or county and city officials who may possess additional documentation or information concerning the site. Copies of relevant state case files will be requested by TechLaw.

#### Task 3 - Title Search

Based on a conversation with the Regional contact, Chuck Shenk, it was decided that a Title Search would be done dating back to 1959. The Title Search will provide the names and addresses of owners of the site along with identification of mortgages, liens, or leases that are available in the public records.



Prior to drafting the Work Plan, TechLaw selected a Title firm in the Tacoma, Washington area to conduct the required research in a timely fashion and at a reasonable cost.

Mr. John Schilling of Tacoma Title Company, 1111 A Street, Tacoma, Washington 98401 will perform a Title Search for the site. A listing of current and previous owners and certified copies of deeds and mortgages showing ownership of the site back to January 1, 1959 will be developed.

TechLaw will work with Mr. Schilling to assure that all required research is being conducted, that adequate documentation is being produced and that effort is not being expended on the development of information not relevant to the Assignment.

#### Task 4 - Interviews With Former Employees

In conversations with the Regional contact during Work Plan development, it was learned that the Regional office has some names of former employees of National Oil, as well as the names of the wife and daughter of the past owner of National Oil.\* While visiting the Region X office information on these individuals, as well as any other leads to former employees, will be obtained. TechLaw will attempt to develop further information on former employees of site owners through interviews with these individuals.

TechLaw will attempt to interview by phone, all identified former employees of site owners and operators. Questions relating to work practices at the site, particularly as they involve the dumping of waste oil filtrate cake, will be asked. Questions concerning other waste disposal practices, offsite waste practices, spills, chemicals handled, and their sources, will also be asked.

---

\*National Oil operated at the site prior to being brought by Time Oil.

#### Task 5 - Corporate Structure Information

For each identified owner or operator of the Time Oil Company site, TechLaw will develop information on corporate structure by contact with the appropriate state agencies and reference to public documents, such as Dunn & Bradstreet reports, SEC reports, and Moody's Industrial Manual. Articles of incorporation and company annual reports will be reviewed if available.

#### Task 6 - Composite Case File Preparation and Report

TechLaw will organize all Federal, state, and other documents according to responsible parties and other categories likely to be relevant in enforcement proceedings. Final case file organization will be in accordance with instructions from EPA. A listing of all documents, by individual document number, will be prepared.

TechLaw will prepare a report for the site, setting forth:

1. A history of ownership and operators at the site dating back to 1959 documented by certified copies of deeds and leases obtained during the title search.
2. The corporate status and structures of each owner or operator of the site; and
3. A report on the work practices at the site for each operator, including waste disposal practices, based upon interviews with former employees and other information in the case file with reference to specific documents in the file.

#### Deliverables

1. ARRCOM Site
  - i. Organized Case file and List of Documents; and
  - ii. Site Report

2. Time Oil Site

- i. Organized Case File and List of Documents, including certified copies of all leases and deeds found during the Title Search; and
- ii. Site Report.



# 5.0 PROGRAM SCHEDULE OF WORK

1983

9/26 9/30 10/7 10/14 10/21 10/28 11/4 11/11 11/18 11/25 12/2 12/9 12/16 12/23 12/30 1/6 1/13 1/20

## ARRCOM SITE

Task 1 - Meetings with Region X

Task 2 - Contact State/Local Officials

Task 3 - Corporate Structure Information

Task 4 - Review of FBI Documents

Task 5 - Interview Generators/Transporters

Task 6 - Case File Preparation

## Time Oil Company Site

Task 1 - Meetings with Region X

Task 2 - Contact State/Local Officials

Task 3 - Title Search

Task 4 - Interview Former Employees

Task 5 - Corporate Structure Information

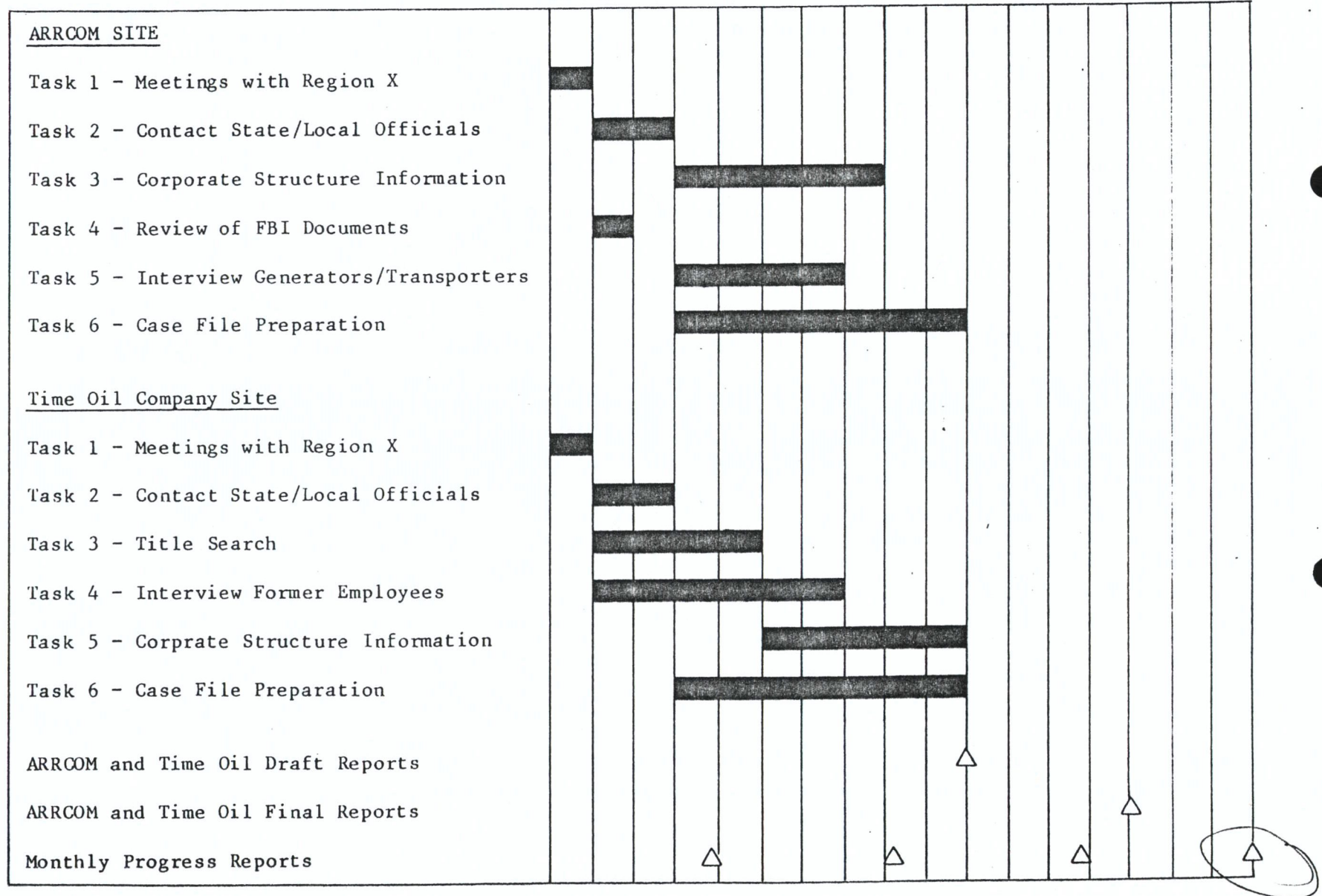
Task 6 - Case File Preparation

ARRCOM and Time Oil Draft Reports

ARRCOM and Time Oil Final Reports

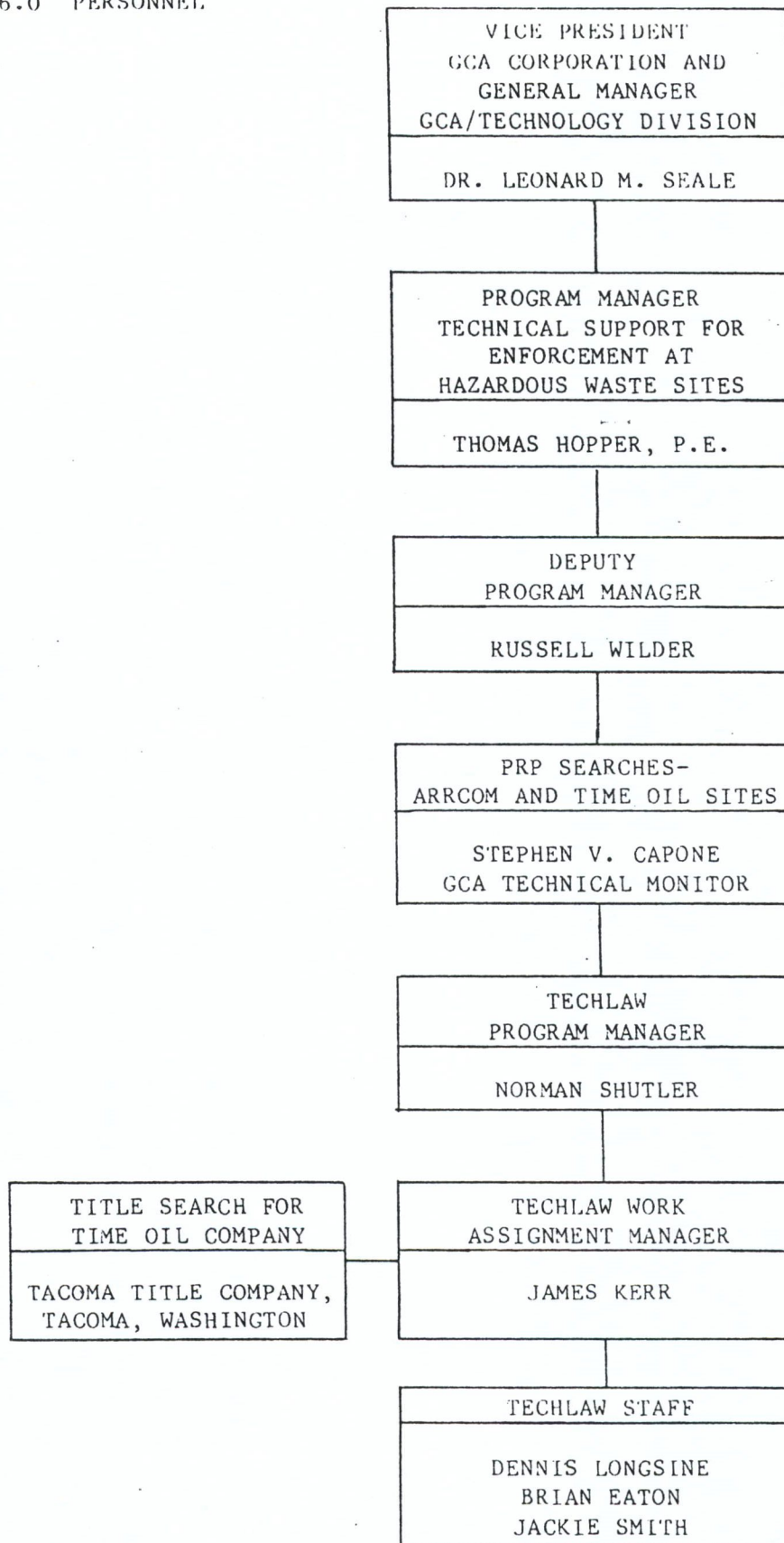
Monthly Progress Reports

11





6.0 PERSONNEL



7.0 ANTICIPATED INTERVIEWS, SUBCONTRACTOR/CONSULTANT USE

GCA's subcontractor, TechLaw, will perform the work necessary to complete this Work Assignment. TechLaw will subcontract the Tacoma Title Company, Post Office Box 1916, 1111 A Street, Tacoma, Washington 98401, to conduct the Title Search for the Time Oil Company site. (Task B.3.)

Interviews with Regional officials will be conducted in person by TechLaw personnel. (Tasks A.1 and B.1.)

Interviews with state and local officials, other knowledgeable individuals in the area, and previous employees of operators of the Time Oil Company site will be conducted by phone. (Tasks A.2, B.2, B.4.)

Interviews with generators and transporters for the ARRCOM site will also be conducted by phone. (Task A.5.)

## 8.0 ANTICIPATED PROBLEMS IN COMPLETING THE WORK ASSIGNMENT

This Work Plan was prepared assuming that sufficient information from past employees or operators of the Time Oil Company site could be obtained through telephone interviews.

If a sufficient number of past employees cannot be contacted by phone and either:

- i. TechLaw personnel must travel to Region X to conduct the interviews;  
or
- ii. A private investigator must be engaged to perform this task; then the proposed level of effort may not be sufficient to accomplish the tasks specified in this Work Plan. Leads to former employees developed during Task B.4 will be followed only so far as the hours estimated in this Work Plan will allow.

At the time of Work Plan development, it was unknown to the Regional contact whether FBI files in the possession of a Grand Jury in Vancouver, Washington would be made available to TechLaw. If TechLaw personnel are required to travel to Vancouver to review the files, there may be insufficient funds to complete the work effort.

## 9.0 COST ESTIMATE

GCA/TECHNOLOGY DIVISION  
A DIVISION OF GCA CORPORATION  
Bedford, Massachusetts 01730

7 November 1983

Page 1 of 3 Pages

COST ESTIMATERESPONSIBLE PARTY SEARCHES AT THE ARRCOM AND TIME OIL CO. SITES

Contract No. 68-01-6769, Work Assignment No. 83-22

(GCA 1-625-022)

| <u>Labor Grade</u>                                     | <u>Description</u>           | <u>Bidding Rate</u> <sup>(1)</sup> | <u>No. of Hours</u>     | <u>Total</u>    |
|--|------------------------------|------------------------------------|-------------------------|-----------------|
| 9  | Principal Scientist/Engineer | \$15.65/hr.                        | 35                      | \$ 548          |
| 4  | Technical Illustrator        | \$ 7.95/hr.                        | 1                       | 8               |
| 3  | Technical Typist             | \$ 7.04/hr.                        | 3                       | 21              |
| Total Direct Labor                                     |                              |                                    | 39 Hours <sup>(3)</sup> | \$ 577          |
| Salary Related Cost <sup>(2)</sup> (32.5%)             |                              |                                    |                         | 188             |
| Subtotal   |                              |                                    |                         | 765             |
| Engineering Overhead <sup>(2)</sup> (88.0%)            |                              |                                    |                         | 673             |
| Subcontracting (see Pages 2 and 3)                     |                              |                                    |                         | 15,939          |
| Subtotal   |                              |                                    |                         | 17,377          |
| General & Administrative Expense <sup>(2)</sup> (3.7%) |                              |                                    |                         | 643             |
| Total Estimated Cost                                   |                              |                                    |                         | 18,020          |
| Fixed Fee  |                              |                                    |                         | 1,061           |
| TOTAL WORK ASSIGNMENT COST                             |                              |                                    |                         | <u>\$19,081</u> |

- Notes: (1) Use of direct labor bidding rates pertinent to 1983 requested on 29 April 1983.
- (2) Use of indirect rates pertinent to 1983 requested on 29 April 1983.
- (3) Of this total, 35 are technical man-hours which, when added to the 357 TMH provided by the subcontractor, amounts to 392 TMH in accordance with the Government estimate for WA No. 83-22.



## 9.0 COST ESTIMATE

7 November 1983  
Page 2 of 3 Pages

Subcontractor Name: Techlaw, Inc.

Subcontractor Location: Herndon, Virginia

## ARRCOM/TIME OIL

Contract No. 68-01-6769, W.A. No. 83-22, GCA W.A. No. 83-22-001-06

| Labor<br>Classification    | Hourly<br>Rate \$/Hr | No. of<br>Hours | Total \$ |
|----------------------------|----------------------|-----------------|----------|
| Professional Level 4       | 26.18                | 85              | 2225.30  |
| Professional Level 3       | 13.28                | 107             | 1420.96  |
| Professional Level 2       | 10.21                | 107             | 1092.47  |
| Professional Level 1       | 7.38                 | 42              | 309.96   |
| -----                      |                      |                 |          |
| Total Direct Labor         |                      | 341             | 5048.69  |
| Overhead/Burden (100.3%)   |                      |                 | 5063.84  |
| Travel                     |                      |                 | 1080.00  |
| Other Direct Costs         |                      |                 | 2142.00  |
| Subcontract                |                      | 16              | 175.00   |
| -----                      |                      |                 |          |
| Subtotal                   |                      |                 | 13509.53 |
| G&A (10.1%)                |                      |                 | 1364.46  |
| -----                      |                      |                 |          |
| Total Estimated Cost       |                      |                 | 14873.99 |
| Fee                        |                      | 357             | 1064.97  |
| -----                      |                      |                 |          |
| Total Work Assignment Cost |                      |                 | 15938.96 |

DIRECT LABOR

Rates shown reflect average rates for the level specified, for fiscal year 1983 (9/30). The approved burden rates are applied and fee is calculated on an hourly basis. A total of 357 work hours is estimated to complete the tasks.

TRAVEL

The cost of one trip to Region X from Washington, D.C. is \$1080.

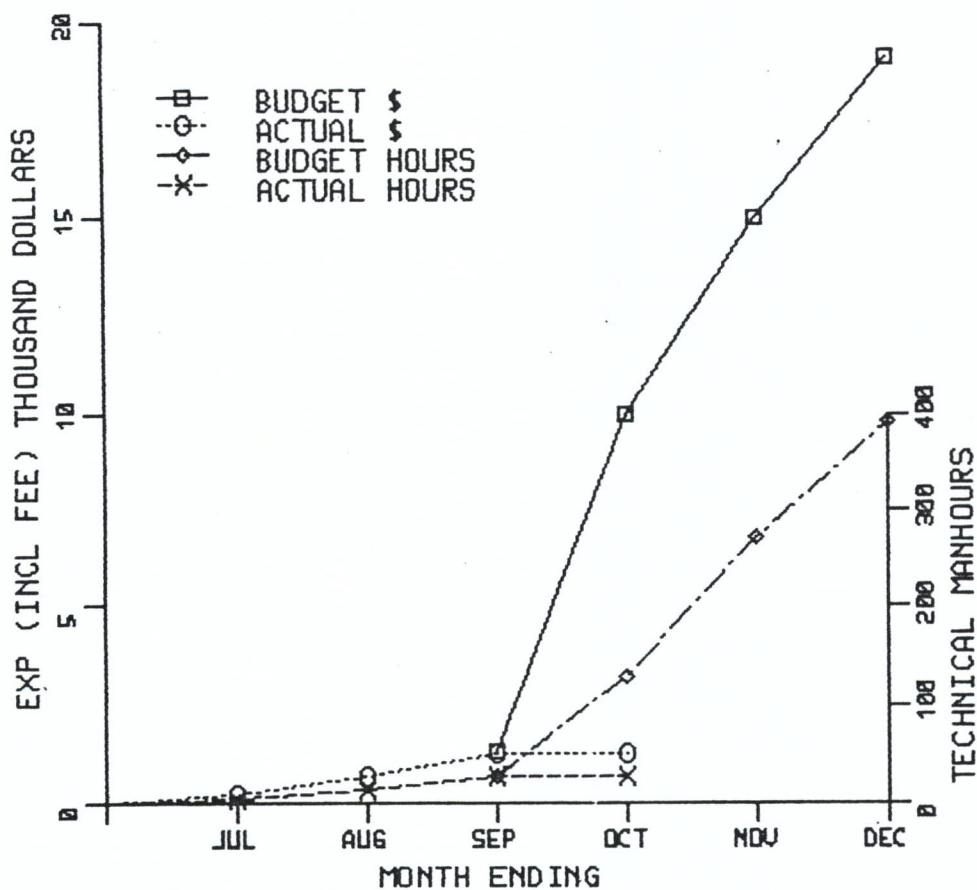
OTHER DIRECT COSTS

Shipping, copying and computer charges are estimated, collectively, at \$6.00 per technical hour, total of \$2,142.

SUBCONTRACTOR/CONSULTANT

A Title Search for the Time Oil Company site is estimated at \$175. This cost figure was presented by Mr. John Schilling of the Tacoma Title Company, 1111 A Street, Tacoma, Washington 98401.

CUMULATIVE PERFORMANCE  
 CONTRACT 68 01 6769 WA 83 22 GCA 1625022  
 TOTAL \$19081 TMH 392



## 10.0 EXCEPTIONS TO THE WORK ASSIGNMENT

Based on a conversation with the Regional contact, Chuck Shenk, it was decided that, although indicated in the Statement of Work, this Work Plan would be prepared assuming that a private investigator need not be engaged to perform any of the tasks included in the Work Assignment.

The amended Work Assignment authorizes 250 technical labor hours and a period of performance to 14 October 1983. This Work Plan estimates 392 technical labor hours, draft reports by 2 December 1983, and final reports by 30 December 1983.